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Attorneys for Respondent

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

FRANK ANTHONY SANCHEZ,

Petitioner,

v.

**DIRECTOR OF CORRECTIONS AND JERRY
BROWN, ATTORNEY GENERAL OF
CALIFORNIA,**

Respondent.

C 07-6292 PJH (PR)

**DECLARATION OF
COUNSEL IN SUPPORT OF
APPLICATION FOR
EXTENSION OF TIME TO
FILE ANSWER**

I, JILL M. THAYER, declare under penalty of perjury as follows:

I am a Deputy Attorney General for the State of California and am presently assigned to represent respondent in this habeas corpus action.

Petitioner is a state prisoner who is serving a sentence of 16 years, 4 months after pleading guilty to assault on a peace officer with a deadly weapon, driving under the influence of alcohol and drugs causing injury, reckless driving while evading a peace officer, driving under the influence of alcohol and drugs causing injury with five multiple victim enhancements, hit and

1 run accident resulting in injuries, exhibiting a weapon at a peace officer, exhibiting a firearm in
2 the presence of a peace officer, possession of a firearm by a convicted felon, possession of
3 ammunition by a prohibited person, altering the identification on a firearm, and using or being
4 under the influence of a controlled substance.

5 By an Order to Show Cause issued on January 25, 2008, respondent was ordered to file
6 an answer on or before March 25, 2008. I am unable to meet the current deadline for filing the
7 answer because of my work on previously assigned cases. In the past 30 days, I have filed one
8 respondent's brief in the California Court of Appeal, one reply brief in the California Supreme
9 Court, and a motion to dismiss in federal court in previously assigned cases. I have obtained the
10 record of petitioner's initial guilty plea and sentence, and the appellate record from petitioner's
11 first appeal in this case.

12 I have not attempted to contact petitioner, who is representing himself in this
13 proceeding, because he is incarcerated in state prison and cannot be conveniently reached.

14 Wherefore, I respectfully request that this Court grant respondent an additional 59
15 days, to and including May 23, 2008, to file an answer in this case.

16 Executed at San Francisco, California, on March 13, 2008.

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21 /s/ Jill M. Thayer
JILL M. THAYER
Deputy Attorney General
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